

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SERVIS ONE, INC., D/B/A BSI	:	
FINANCIAL SERVICES, INC., BSI	:	
FINANCIAL HOLDINGS, INC., ENTRA	:	
SOLUTIONS PVT. LTD. and GAGAN	:	
SHARMA,	:	
	:	
<i>Plaintiffs,</i>	:	CIVIL ACTION NO. 20-4661-MAK
	:	
v.	:	
	:	
OKS GROUP, LLC, OKS GROUP	:	
INTERNATIONAL PVT. LTD., and	:	
VINIT KHANNA,	:	
	:	
<i>Defendants.</i>	:	

**PLAINTIFFS’ AND DEFENDANTS’ JOINT STATEMENT**

Pursuant to Paragraph 3 of this Court’s January 2, 2024 Order (ECF No. 219), Plaintiffs and Defendants (the “Parties”) submit this Joint Statement:

a. Despite their best efforts, the Parties have been unable to reach an agreement that further mediation before Judge Vanaskie at this time would be fruitful.

b. The Parties agree that the fraud claim asserted by Plaintiffs in Count III of their Third Amended Complaint (and the prior complaints) is dependent upon the existence and enforceability of a settlement agreement between the parties in 2020.

Based on the trial court’s December 27, 2023 Order (ECF No. 218) entering partial judgment in favor of Defendants and against Plaintiffs on Counts I, II, and IV of the Third Amended Complaint, a decision with which Plaintiffs disagree and reserve the right to challenge on appeal, the Court should enter final judgment on all Counts, including Count III. Defendants reserve all rights with regard to Count III in any further proceedings, including the right to raise any and all defenses and challenges to Plaintiff’s fraud claim and the damages sought therein.

The Parties agree to stipulate to the entry of final judgment in favor of Defendants and against Plaintiffs on all Counts of the Third Amended Complaint (although Plaintiffs do not waive and rather reserve their rights to challenge the trial court's December 27, 2023 Order on appeal and to proceed on all counts depending on the disposition of the appeal, and Defendants reserve all rights to assert any and all defenses and challenges to such counts). The Parties' Joint Proposed Order is attached.

c. The entry of final judgment on Count III obviates the need for a jury trial in March 2024 and allows Plaintiffs to proceed with an appeal of the trial Court's December 27, 2023 Order if they elect to do so absent a settlement.

Dated: January 22, 2024

Respectfully,

**MORGAN, LEWIS & BOCKIUS LLP**

/s/ Glen R. Stuart

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2024, a true and correct copy of the foregoing document was served via electronic filing upon the counsel of record via the ECF system.

Dated: January 22, 2024

/s/ Glen R. Stuart  
Glen R. Stuart